SEMS-RM DOCID # 88208338

IMAGETRAX # 3740-00001

MISSION LAND CO 6PT FOLDER



MEMORANDUM

To: Rachel Loftin

From: Mitchell K. Middagh, URS Consultants MM

Date: January 20, 1992

Subject: Completed Work

Attached is the following completed:

PA:	\Box	PA Review:	SSI:	LSI:	SIRe: □

Other: <u>Preliminary Assessment Summary</u>

Site Name: Mission Land Company Wh #3796

EPA ID#: CAD981654106

City, County: Manhattan Beach, Los Angeles County

State Recommendation: (for reviews only)

CERCLIS Lead: EPA PA1 Complete NFRA9 12-20-9

PA complete

PLA.

Referred to UST Byn

MEMORANDUM

To: Rachel Loftin

From: Mitchell K. Middagh, URS Consultants

Date: December 6, 1991

Subject: Completed Work

Attached is the following completed:

PA: □ PA Review: □ SSI: □ LSI: □ SIRe: □

Other: <u>Preliminary Assessment Summary</u>

Site Name: Mission Land Company

EPA ID#: CAD981654106 (37A4)

City, County: Manhattan Beach, Los Angeles County

State Recommendation: (for reviews only)

For EPA Use Only

CERCLIS Lead: 🗲 PA 🗸

Purpose: Preliminary Assessment Summary

Site: Mission Land Company

1500 Rosecrans Avenue Manhattan Beach, CA 90266

Los Angeles County

Site EPA ID Number: CAD981654106

URS Investigators: Kurt D. Anderson

Carrie L. Taylor

Date of Inspection: September 24, 1991

Report Prepared By: Carrie Taylor

Report Reviewed By: Chris Nelson Mitchell K. Middagh

Review/Concurrence:

Report Date: January 20, 1992

Submitted To: Rachel Loftin

EPA Region IX

Work Assignment Manager

1.0 Introduction

Under authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), the U.S. Environmental Protection Agency (EPA) contracted URS Consultants to conduct a Preliminary Assessment Summary of Mission Land Company, located in the City of Manhattan Beach, California. This summary documents URS' investigative efforts.

2.0 Site Description

Mission Land Company, in conjunction with investment partner, Comstock, Crosser, and Hickey, are the owners of the property referred to in EPA files as Mission Land Company. This partnership, known formally as Mission-CCH1, Limited, (Mission) is a property development group that purchased the subject property in 1988 from Data General Corporation. Mission planned to construct office buildings and a small shopping mall on the property. The property was purchased by Data General Corporation in the mid 1980's from Chevron Oil and Gas Company (Chevron). Chevron used the site as as a crude oil tank farm from 1920 through sometime in the 1960's (2).

Prior to purchasing the property from Data General, Mission conducted an "environmental due diligence" investigation to "...evaluate land use at the site and its immediate surroundings for evidence of impairment due to handling or other uses of potentially hazardous materials" (1). The investigation revealed petroleum contamination at the site that was assumed to be related to activities conducted while the property was owned by Chevron (1920 through mid 1980's). The findings of the investigation are detailed in a preliminary assessment report by Dames and Moore (1).

According to the report, the site is located in the northeastern part of the former Chevron oil storage area. Part of the site is located within the boundary of one of four former reservoirs (tank farm) that comprised the oil storage area. The reservoirs were used for the storage of crude oil, fuel oil, and emulsified oils. Cutter stock, a product similar to kerosene and diesel, may also have been stored in the reservoirs (2).

Large quantities of soil were discovered to be contaminated with oil when Chevron dismantled the reservoirs in the early 1980's. It appears that during subsequent grading operations, oily soils were mixed with clean soils and spread over the former storage site, according to Chevron's consultants Medall and Associates (2). A further investigation conducted by Petroleum Industry Consultants (PIC) on behalf of Mission in January 1990 indicates that approximately 6,000 cubic yards of contaminated soil were mixed with clean soil across the former storage area at depths ranging from 4 to 20 feet. The report also indicates that the impacted area covers about 15,000 square feet. Not all of the contaminated area is located at the site. A golf course directly adjacent to the south end of the site appears to be the likely area containing the majority of the contamination (2).

PIC drilled, sampled, and tested three soil borings during the investigation to document the vertical extent of contamination at the southeast end of the site and to characterize the type and concentrations of contaminants. A total of 10 samples were collected and analyzed for total petroleum hydrocarbons (TPH), purgeable organics, and CAM metals (California Assessment Method). Results from 4 samples were reported. TPH was found at 38,000, 10,000, 14, and 9 mg/kg, respectively. Purgeable organics were all "ND" (not detected) with the exception of toluene, ethylbenzene, and xylenes in one sample: .73, 1.50, and 7.0 mg/kg, respectively. Quantitative results for metals were not reported; results were noted "All below STLC" (Soluble Threshold Limit Concentration). Detection limits were not reported with the analytical results for the four samples. Laboratory reports were not included in the investigation report (2).

Mission also learned that in addition to the petroleum-related contamination left from the former storage tanks, the site had a potentially dangerous methane gas (vapor) problem. Apparently this was caused by anaerobic bacterial degradation of the buried, contaminated soil. Mission was required to include a methane remediation system in all building plans for the site (2,3).

All building plans were approved with a passive methane barrier system. Construction proceeded and the shopping mall and adjacent restaurant and office buildings were completed. Mission split the 15 acre parcel into 6 and 9 acre parcels. A four-story office building is located on the 6 acre parcel. The office building address remains as 1500 Rosecrans Avenue (the site address listed in the EPA files). The remaining 9 acre parcel was further broken into smaller parcels (1570 through 1590 Rosecrans Avenue), and comprises the shops that make up the shopping mall. The 1500 Rosecrans property was sold to Franklin Properties of San Mateo, California. Mission remains the owner of the shopping mall (known as Manhattan Marketplace) (3).

It appears that the site was listed in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) because of a letter from Mission Land Company's attorneys to EPA Administrator William Reilly. The letter informs EPA of Mission's intent to recover costs from Chevron associated with the installation of the methane barrier system and other remedial activities conducted at the site. URS Consultants conducted a site reconnaissance of the property as part of an EPA preliminary assessment. Documentation of some of Mission's environmental investigations were reviewed by URS and are included in the site files (1,2,4). It appears, however, that the environmental issues impacting the site are precluded from further investigation under CERCLA because of the petroleum exclusion clause.

3.0 Regulatory Involvement

Mission was required to conduct a Preliminary Endangerment Assessment for the evaluation of petroleum contamination and subsequent methane vapors produced at the site prior to development of the property. The City of Manhattan Beach and the California Department of Health Services (DHS) were involved in approving the permitting, installation, and monitoring the passive methane barrier system that was included in building specifications.

DHS (now known as Cal-EPA Department of Toxic Substances Control) is currently working with Chevron in the remaining tank farm and refinery surroundings to assess environmental issues and to negotiate the clean-up of areas surrounding the site. The Mission property is not included as part of the assessment or negotiations for clean-up as DHS feels that environmental issues impacting the Mission site were addressed and resolved in the Preliminary Endangerment Assessment conducted by PIC on behalf of Mission (5).

4.0 Summary of HRS Considerations

4.1 Waste Type and Characteristics

Hazardous substances have been identified for the site. However, these substances, which include petroleum and petroleum related substances such as methane, toluene, ethylbenzene, and xylenes are ineligible for HRS considerations under the CERCLA petroleum exclusion clause. Therefore, waste quantities and characteristics are not provided as part of this assessment.

4.2 HRS Pathways of Concern

The Hazard Ranking System (HRS) is a scoring system used to assess the relative threat associated with actual or potential releases of hazardous substances from sites. The system is the principal mechanism used by the EPA to place hazardous waste sites on the National Priorities List (NPL). The primary HRS factors pertinent to the Mission Land Company site are:

- Identified hazardous substances include petroleum and petroleum related substances: methane, toluene, ethylbenzene, and xylenes. In this case, substances are ineligible for HRS considerations under the CERCLA petroleum exclusion clause.
- The source of the contamination (tank farm) has reportedly been eliminated. Contamination at the site may require further investigation outside CERCLA.
- The site is unrestricted to public access and the nearest residence is within 1/4 mile of the site. However, the entire site is paved with asphalt and concrete. Additionally, contaminated soils were reportedly topped with approximately 4 feet of clean soil. It is unlikely that the public would come into contact with contaminated soils.
- The shallowest groundwater aquifer (Old Dune Aquifer) is not used as a drinking water source. Deeper aquifers (Gage and Silverado) are used for drinking water and industrial purposes and appear to generally be separated from the Old Dune Aquifer and from each other by intermediate aquitards (Manhattan Beach and El Segundo).
- A release or the potential to release to surface water from the site appears low. Water from the Los Angeles River is not used as a drinking water source. In addition, surface runoff potential of buried, contaminated soils has been eliminated by paving the entire site.
- The potential for release to air pathways exists. A release of methane and or other aromatic compounds (as petroleum by-products) is possible. It appears, however, that these compounds are not eligible for HRS scoring in this case under the CERCLA petroleum exclusion clause.

EPA Recommendations *5.0*

No Further Remedial Action planned Under CERCLA	Initial W	Date P2019
Higher-Priority SI under CERCLA		
Lower-Priority SI under CERCLA		
Defer to Other Authority (e.g., RCRA, TSCA, NRC)		

<u>Initial</u>



References

- 1. Dames and Moore, Preliminary Site Assessment, Data General Property, 1500 Rosecrans Avenue, Manhattan Beach, California for Comstock, Crosser, and Hickey Development Group, December 31, 1987.
- 2. Petroleum Industry Consultants, Environmental Services, *Preliminary Endangerment Assessment for Comstock, Crosser, and Hickey Development Company,* March 13, 1990.
- 3. Anderson, Kurt D., and Carrie Taylor, Site Reconnaissance Interview and Observations Report of Mission Land Company, September 24, 1991.
- 4. Dames and Moore, Geotechnical Investigation, Manhattan Marketplace-Retail Site, Manhattan Beach, California, for Comstock, Crosser, and Hickey Development Group, December 5, 1989.
- 5. Ives, Lindsay, CAL EPA, Department of Toxic Substances Control, and Carrie Taylor, URS Consultants, telephone conversation, September 26, 1991.

Appendix A Contact Log and Reports

Contact Log

Facility Name: Facility ID #:

Mission Land Company CAD0981654106

Contact	Affiliation	Phone #	Date	Information
Satish Gulati	Cal EPA - Region 3	(818) 567-3126	08/28/91	Cal EPA - Region 3 does have information on Mission Land. Documents copied by URS on 09/16/91.
Nhan Bao	Regional Water Quality Control Board - Region 4	(213) 266-7500	9/12/91	RWQCB - Region 4 does not have any files on Mission Land Company.
Brad Skepner	Comstock, Crosser, & Hickey	(213) 546-5718	9/17/91	See Contact Report. Confirmation was by fax on 09/17/91.
Lindsay Ives	CAL EPA	(818) 567-3075	10/26/91	See Contact Report. Confirmation was by fax on 10/26/91.

URS Consultants

Preliminary Assessment Site Inspection Team

Contact Report

	Ison Rosecrans Avenue Manhattan, California Department: Address: City, State, Zip Code: County: Representative Contacted: Name: Contact Phone Number: Contact Date: Contact Date: Contact Date: Contact Trile: Contact Date: Contact Trile: Contact Date: C	Contact Made Concerning:	CAD981654106
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	Confirmation: Wies Live Confirmation by: Letter Phone Kilother tax		9

CAD981654106 Mission Land Company

Contact Report (continued)

Comstock, Crosser, and Hickey: Contact: Angela Brown, Brad Skepner,

Comments Continued:

parking lot, which remains 1500 Rosecrans Avenue. This parcel and building was sold to Franklin Properties. Inc., of 1800 Gateway Drive, Suite 200, San Mateo, California 94404. The property is managed locally by Continental Property Management 9045 Haven, Suite 100, Rancho Cucomonga, CA 91730. The remainder of the property (approximately 9 acres) is defined as 1570 through 1590 Rosecrans Avenue. The property is now a small shopping mall and is owned by Mission.

The site and surrounding property were formerly owned by Chevron and used as a tank farm. Chevron still owns property nearby and continues to operate a tank farm as close as 1/4 mile from the Mission property. According to Brad, Chevron did conduct demolition and grading of the property prior to sale to Data General. However, Mission was required to conduct an remedial investigation/feasibility study on the property after it was purchased Data General and prior to any development of the shopping mall. Apparently, there was still petroleum product left in the ground and product degradation process were causing a significant methane gas problem. Mission installed passive methane barrier systems on the now 1500 Rosecrans and 1570-90 Rosecrans Avenue buildings as per the City of Manhattan Beach.

Mission conducts quarterly monitoring of its facilities for methane gas vapors. The methane barrier system was installed by John Sepich, of Methane Specialists. 3609 East Thousand Oaks Boulevard, Westlake Village, California 91362. Phone number is 805-373-9321.

The environmental investigations were conducted by Dames and Moore, project manager and phone number not available, and by Petroleum Industry Consultants, Tim Hersch Project Manager, 7261 Mars Drive, Huntington Beach, CA 92647. Phone number is 714-842-6331.

I told Brad that if we needed to contact these consultants we would not do so without his approval. He does have copies of all the reports from these consultants and will make them available to us at the time of our site inspection.

URS Consultants

Preliminary Assessment Site Inspection Team

Contact Report

Cardan M. I. C.	
Contact Made Concerning:	CAD981654106
	Mission Land Company
	1500 Rosecrans Avenue Manhattan, California 90266
	County of Los Angeles County
Agency or Affiliation Contact:	Cal EPA
Department:	Department of Toxic Substances Control
Address:	14-5 North San Fernando Boulevard #300
City, State, Zip Code:	Burbank CA 91504
County:	Los Angeles
Representative Contacted:	
Name: 1.	Lindsay Ives 2. 3.
Title:	Haz. Mtls. Specialist
Contact Phone Number: Contact Date:	818-567-3000 10/26/91
Contact Date.	10/20/91
Comments:	
and I left a voice mail message for	ere was any involvement from his agency on the site. He was not available him.
to Mission Land Company. (He k when it was known as the Departn gas system. He also indicated that	im what the Preliminary Assessment program was about and how it applied the the site as Comstock, Crosser, and Hickey). He said that the agency, ment of Health Services, had oversight of the building plans for the methane the agency was responsible for signing off the Preliminary Endangerment ced by Petroleum Industry Consultants.
Chevron-related environmental iss being evaluated do not include the	incy is currently working with Chevron Development to address sues in the area surrounding the Mission site. Lindsay said that the areas Mission site because as far as the agency is concerned, environmental were successfully addressed in the Preliminary Endangerment August 10/26/92
	Oxylor 10/26/9/ Page 1 of 1
Confirmation: ⊠Yes □No	Confirmation by: ☐ Letter ☐ Phone ☒ Other

Appendix B Site Reconnaissance Report

URS Consultants

Preliminary Assessment Site Inspection Team

Site Reconnaissance Interview and Observation Report

Site Information CAD981654106

Name:

Mission Land Company

Address:

1500 Rosecrans Avenue

City, State, Zip Code:

Manhattan, California 90266

Phone Number:

(213) 546–5781

Contact Name:

Mr. Brad Skepner

Date of Site Visit:

09/24/91

URS Site Visit Team:

Kurt Anderson

Carrie Taylor

Site Representatives

Name:

Brad Skepner

Fred Hickey

Title

Property Manager

Partner

Comments and Observations

Kurt Anderson and myself met at the site with Brad Skepner and Fred Hickey of Comstock, Crosser, and Hickey Developers (CCH). Mr. Skepner is the company's property manager and Mr. Hickey is a partner in the development group corporation. The property is officially owned by Mission-CCH1-Limited, c/o Comstock, Crosser, and Hickey, 321 12th Street, Manhattan Beach, California. (Mission Land Company is the equity partner who, along with CCH purchased the site property, hence the "Mission" portion of the property title name.).

Mission-CCH1-Limited (Mission) purchased the property from the Data General Corporation in 1988. Data General had purchased the property from Chevron Oil and Gas Company in the mid 1980's. At the time of Mission's purchase, the site was comprised of 15 acres and was completely undeveloped. Mission planned to develop the property and build office buildings and a mini shopping mall. Prior to the purchase of the property, Mission conducted environmental due diligence and had the property assessed for potential environmental impacts and a further geotechnical investigation by Dames and Moore (December 1987).

The investigation resulted in finding that the site was once a former storage facility for Chevron Oil and Gas Company (Chevron). There was evidence that the soil onsite was subject to residual petroleum contamination from the former storage area. Additionally, the site had a significant methane gas problem, which was assumed to be the result of bacterial degradation of the petroleum products in the contaminated soil. Brad mentioned that the area was originally intended for residential housing, but that when the contamination and methane was discovered, all plans for residential expansion were halted. (It is unclear how this action was taken, or by whom. URS cannot verify if this is a fact.)

Continued

CAD981654106 Mission Land Company

Site Reconnaissance Interview and Observation Report (Continued)

Comments and Observations (continued)

09/24/91

In order to determine if they could proceed with construction of the planned buildings and to meet requirements of DHS, Mission was required to conduct additional remedial investigations. These investigations were apparently to determine the extent of any soil contamination at the site and to determine if the property was suitable for construction. A full Remedial Investigation/Feasibility Study (RIFS) and geotechnical assessment, and a preliminary endangerment assessment were conducted by Dames and Moore, and Petroleum Industry Consultants (PIC), respectively. The project manager for Dames and Moore was not identified. The project manager for PIC was Tim Hersch. PIC address: 7261 Mars Drive, Huntington Beach, CA 92647. Phone number is 714-842-6331. A copy of both firms' reports are available in URS' site files.

In addition to the remedial investigations, Mission was required to include a passive methane barrier system in its building plans to remediate potential methane gas problems throughout any planned facilities. The shopping mall and adjacent office and restaurant buildings were completed. In 1989, Mission split the property and sold the northwest corner of the parcel, which was approximately 6 acres and had a four or five story office building located on it. The address of this parcel and building remains 1500 Rosecrans Boulevard, Manhattan Beach. A walk around the periphery of the office building was conducted by URS. One office building and a large parking area appear to be the only development of the property. Mission did install a passive methane barrier system in this building. This building and property was sold by Mission to Franklin Properties, Inc., 1800 Gateway Drive Suite 200 San Mateo, California 94404.

The current Mission property is comprised of approximately 9 acres and is known to the public as Manhattan Marketplace. Manhattan Marketplace is a small shopping mall with restaurants, a grocery store, a dry cleaners (drop facility only), a beauty supply store (retail only), and a book store. The addresses of the mall range from 1570 through 1590 Rosecrans Avenue, Manhattan Beach, California. The site is completely paved and is fenced on the eastern and southern sides. Public access is unrestricted, however. The nearest residence is within 1/4 mile of the site. The site is in a commercially zoned area. The site is bounded by Rosecrans Avenue to the North, a TRW administrative facility on the east, a public golf course and hotel to the south, and a parking lot and office building to the west.

The property is still monitored quarterly for methane gas vapors by the firm that installed the system, Methane Specialists, 3609 East Thousand Oaks Boulevard, Westlake Village, California 91362. The contact is Mr. John Sepich. His phone number is 805-373-9321. Monitoring data is in Mission's files at the Comstock, Crosser, Hickey address above.

URS determined during a review of available documents at the Mission offices that this site is probably not eligible for HRS considerations as it appears to fall under the CERCLA petroleum exclusion clause. This will be relayed to Rachel Loftin for further determination.

Carringlar 1/20/92

MEMORANDUM , TE

3740

an in sold

To: Rachel Loftin

From: Mitchell K. Middagh, URS Consultants MM

Date: January 20, 1992

Subject: Transmittal List for Mission Land Company

Preliminary Assessment Summary

CAD981654106

URS suggests that the following persons/agencies receive a copy of the document referenced above:

Comstock, Crosser, & Hickey
 321 12th Street
 Manhattan Beach, California 90266
 Attn: Brad Skepner

Regional Water Quality Control Board 101 Centre Plaza Drive Monterey Park, California 91754-2156

California Environmental Protection Agency Region 3
Department of Toxic Substances Control
1405 N. San Fernando Boulevard
Burbank, California 91504
Attn: Lindsay Ives

Athi Nhan Bai

URS Consultants, Inc. Contract No. 68-W9-0054

ARCS EPA Region IX WA No. 54-14-9J00

EPA C

Potential Hazardous Waste Site Preliminary Assessment Form

Identification				
State:	CERCLIS Number			
California	CAD981654106			
CERCLIS Disc	cover Date:			
12/26/90				

Y Z			CER	CLIS Discover Date:	
				12/26/90	
1. General Site Info	ormation				
Name: Mission Land Company	,	Street: 1500 Rose	crans Avenu	ıe	
City: Manhattan		State: California	Zip Code: 90266	County: Los Angeles	County
Latitude: 33°54'00" N	Approximate Area of Site:	Status of Site:		County Code: 037	
Longitude: 118°25'00"W	15 Acres	☐ Active☐ Inactive☐ Not Specified	□NA	Cong. Dist.:	
110 2500 W	Square Ft	. Not Speci	nea	27	
2. Owner/Operator	^r Information				
Owner: Mission-CCH1, Limited	i	Operator:			
Street: 321 12th Street		Street:			
City:		City:	······································		
Manhattan Beach					
State: Zip Code: Te CA 90266 Te	elephone:	State:	Zip Code:	Telephone:	
Type of ownership	1	How Initially Identified			
 ☑ Private ☐ Federal Agency ☐ State ☐ Indian ☐ County ☐ Mun. ☐ Not S ☐ Other 	☐ Citizen Compla☐ PA Petition☐ State/Local Prog☐ RCRA/CERCL	gram	☐ Federal Progri ☐ Incidental ☐ Not Specified		
				. 2 0 2 10 1	
3. Site Evaluator	Information			. 2	
Evaluator:	Information Agency/Organizati			Date Prepare	ed:
Evaluator: Kurt Anderson		URS Consulta	nts	Date Prepare	ed: 20/92
Evaluator: Kurt Anderson Street: 401 E. Ocean Blvd.	Agency/Organizati	URS Consulta City: Long Beach		Date Prepare	ed:
Evaluator: Kurt Anderson Street:	Agency/Organizati	URS Consulta		Date Prepare	ed: 20/92 ate:
Evaluator: Kurt Anderson Street: 401 E. Ocean Blvd. Name of EPA or State Agency Conta	Agency/Organizati	URS Consulta City: Long Beach	e Street	Date Prepare 1/	ed: 20/92 ate:
Evaluator: Kurt Anderson Street: 401 E. Ocean Blvd. Name of EPA or State Agency Conta	Agency/Organizati	URS Consulta City: Long Beach Street: 75 Hawthorne State: California	e Street	Date Prepare 1/ St	ed: 20/92 ate:
Evaluator: Kurt Anderson Street: 401 E. Ocean Blvd. Name of EPA or State Agency Conta Rachel Loftin City: San Francisco	Agency/Organization Inct (for EPA use One of the content of the	URS Consulta City: Long Beach Street: 75 Hawthorne State: California Commendations: Priority SI	Signature:	Date Prepare 1/ St	ed: 20/92 ate: California

	ardous Waste Site ssessment Form - P	age 2 of 4	CERCLIS Number: CAD981654106
5. General Site Characteristi	CS		
☐ Commercial ☐ Agriculture ☐ DOE	all that apply): Other Federal Facility Other	Site Setting: Urban Suburban Rural	Years of Operation: Beginning Year Ending Year Unknown
Type of Site Operations (Check all that apply):			Waste Generated:
☐ Manufacturing ☐ Lumber and Wood Products ☐ Inorganic Chemicals ☐ Plastic and/or Rubber Products ☐ Paints, Varnishes ☐ Industrial Organic Chemicals ☐ Agricultural Chemicals (e.g., pesticides, fertilizers) ☐ Miscellaneous Chemical Products (e.g., adhesives, explosives, ink) ☐ Primary Metals ☐ Metal Coating, Plating, Engraving ☐ Metal Forging, Stamping ☐ Fabricated Structural Metal Products ☐ Electronic Equipment ☐ Other Manufacturing ☐ Mining ☐ Metals ☐ Coal ☐ Oil and Gas ☐ Non-metalic Minerals	□ Recycling □ Junk/Salvage Yard □ Municipal Landfill □ Other Landfill □ DOD □ DOI □ Other Federal Facili □ RCRA □ Treatment, Stora □ Large Quantity G □ Small Quantity G □ Subtitle D □ Municipal □ Industrial □ "Converter" □ "Protective Filer" □ "Non- or Late Filer" □ Not Specified □ Other	ge, or Disposal enerator Generator	☐ Onsite ☐ Offsite ☐ Onsite and Offsite Waste Deposition Authorized By: ☐ Present Owner ☐ Present and Former Owner ☐ Unauthorized ☐ Unknown Waste Accessible to the Public: ☐ Yes ☐ No Distance to Nearest Dwelling, School, or Workplace:
			1320 Feet
6. Waste Characteristics Info	ormation		
Check all that apply) Landfill Surface Impoundment Drums Tanks and non-Drum Containers Chemical Waste Pile Scrap Metal or Junk Pile Tailings Pile Trash Pile (open dump) Land Treatment Contaminated Ground Water Plume (unidentified source) Contaminated Surface Water/Sediment (unidentified source)	(include units)		Types of Waste (check all that apply): Metals Drganics norganics Solvents Paints/Pigments Laboratory/Hospital Waste Radioactive Waste Dily Waste Pesticides/Herbicides Acids/Bases Construction/Demolition Waste Municipal Waste Mining Waste Explosives Other I State of Waste as Deposited all that apply): Solid Gas

CERCLIS Number: Potential Hazardous Waste Site CAD981654106 Preliminary Assessment Form - Page 3 of 4 7. Ground Water Pathway Is There a Suspected Release To List Secondary Target Population Served by Ground Is Ground Water Used for Drinking Water Within 4 Miles: Ground Water: Water Withdrawn From: ⊠ Yes ✓ Yes ☐ No \square No 0 - 1/4 Mile Have Primary Target Drinking Water Wells Been Identified: Type of Drinking Water Wells Within 4 Miles (Check all that apply) > 1/4 - 1/2 Mile ☐ Yes ☐ Private ⊠ No > 1/2 - 1 Mile ☐ None If Yes, Enter Primary Target Population: > 1 - 2 Miles Depth to Shallowest Aquifer: - People > 2 - 3 Miles _ Feet Nearest Designated Wellhead Protection Area: > 3 - 4 Miles Karst Terrain/Aquifer Present: □ 0 - 1/4 Mile ☐ Yes □ >1/4 Mile - 4 Miles Total Within 4 Miles_____ ⊠ No None Within 4 Miles 8. Surface Water Pathway Type of Surface Water Draining Site and 15 Miles Downstream (Check all that apply) Shortest Overland Distance From Any Source to Surface Water: Feet ☐ Stream ☐ River ☐ Pond ☐ Lake ☐ Ocean ☐ Other_Storm drains_ Miles Is There a Suspected Release to Surface Water: Site is Located in: ☐ Annual - 10 yr Floodplain ☐ Yes $\square > 10 \text{ yr} - 100 \text{ yr Floodplain}$ ⊠ No \square > 100 yr - 500 yr Floodplain ⊠ > 500 yr Floodplain Drinking Water Intakes Located Along the Surface Water List All Secondary Target Drinking Water Water Intakes: Migration Path: ☐ Yes ⊠ No **Name** Water Body Flow (cfs) Population Served Have Primary Target Drinking Water Intakes Been Identified: ☐ Yes ⊠ No If Yes, Enter Population Served by Primary Target Intakes: People Total within 15 Miles -Fisheries Located Along the Surface Water Migration Path: List All Secondary Target Fisheries: ✓ Yes No Waterbody/Fishery Name Flow (cfs) Santa Monica Bay __NA Have Primary Target Fisheries Been Identified: ☐ Yes ⊠ No

CERCLIS Number: Potentia razardous Waste Site CAD981654106 Preliminary Assessment Form - Page 4 of 4 8. Surface Water Pathway (continued) Wetlands Located Along the Surface Water Migration Path: Other Sensitive Environments Located Along the Surface Water Migration Path: ✓ Yes ☐ Yes ⊠ No ☐ No Have Primary Target Wetlands Been Identified: Have Primary Sensitive Environments Been Identified: ☐ Yes ☐ Yes ⊠ No ⊠ No List Secondary Target Wetlands: List Secondary Target Sensitive Environments: Frontage Miles Sensitive Environment Type Water Body Flow (cfs) Water Body Flow (cfs) 9. Soil Exposure Pathway Are People Occupying or Attending School or Day Care on or Within Have Terrestrial Sensitive Environments Been Identified on or Within 200 Feet of the Site. Number of Workers Onsite: 200 Feet of Areas of Known or ☐ None Suspected Contamination: ☐ Yes ☐ Yes ⊠ No $\Box 1 - 100$ ⊠ No □ 101 - 1,000 If Yes, List Each Terrestrial If Yes, Enter total Resident Population: Sensitive Environment: $\Box > 1,000$ _ People 10. Air Pathway Is There a Suspected Release to Air: Wetlands Located Within 4 Miles of the Site: ⊠ Yes ☐ Yes ⊠ No □ No Enter Total Population on or Within: Onsite Other Sensitive Environments Located Within 4 Miles Of The Site: 0 - 1/4 Mile ☐ Yes > 1/4 - 1/2 Mile ⊠ No > 1/2 - 1 Mile List All Sensitive Environments Within 1/2 Mile of the Site: > 1 - 2 Miles **Distance** Sensitive Environmental Type/Wetlands Area (acres) > 2 - 3 Miles Onsite > 3 - 4 Miles 0 - 1/4 Mile Total Within 4 Miles > 1/4 Mile - 1/2 Mile ___

** PROD VERSION **
U.S. EPA SUPERFUND PROGRAM
** C E R C L I S **
SITEO3: SITE INFORMATION FORM(SIF)

PAGE NO: 40
CERHELP DATA BASE DATE: N/A
CERHELP DATA BASE TIME: N/A
FOR INTERNAL USE ONLY

SITE/INCIDENT FORM 1 (SI1) *SITE NAME: MISSION LAND CO. *EPA ID NO: CAD981654106 FMS SITE/SPILL ID:	S/I RPM-OSC NAME/PHONE:	ENFORCEMENT SENSITIVE INFORMATION
ALIAS NAME(S): COMSTOCK, CROSSER AND HICKEY	, MISSION CCH1-LI	
*STREET: 1500 ROSECRANS AVE. *CITY: MANHATTAN BEACH *COUNTY: LOS ANGELES *STATE: CA *ZIP: 90266		*LATITUDE: 33/54/00.0 *LONGITUDE: 118/25/00.0 *LL SOURCE: G *LL ACCURACY: _
CONGRESSIONAL DISTRICT: 27 *COUNTY CODE: 037 *SMSA: 4480 USGS HYDRO UNIT: FED AGENCY PRP FLG: N STATE PRP FLAG: N PRP AGENCY CODE:,,,,, SECTION CODE:,,,,		*FED. FACILITY FLAG: N *RCRA FACILITY FLAG: FED FACILITY DOCKET FLAG: F DIOXIN TIER: SITE NAME SOURCE: MUNICIPAL PRP FLAG: N COST RECOVERY IND: E
AGGREGATE CASE BUDGET OBLIGATIONS: AGGREGATE FUND OBLIGATIONS: TBD		
*SITE/INCIDENT ABSTRACT:		
*SITE CLASSIFICATION: ND		·
(NG) FUND LEAD/NEGOT (F (FE) FEDERAL ENFORCEMENT (ND) FUND LEAD/NO NEGOT) NO DETERMINATION(DEFAULT)	(SE) STATE ENFORCEMENT

** PROD VERSION **
U.S. EPA SUPERFUND PROGRAM
** C E R C L I S **
SITEO3: SITE INFORMATION FORM(SIF)

PAGE NO: 47
CERHELP DATA BASE DATE: N/A
CERHELP DATA BASE TIME: N/A
FOR INTERNAL USE ONLY

SITE/INCIDENT FORM 2 (SI2/MED) *SITE NAME: MISSION LAND CO. *EPA ID NO: CAD981654106 FMS SITE/	SPILL ID:	S/I RPM-OSC NAME/PHONE: _ OTHER REG CONTACT NAME/PHONE: _	ENFORCEMENT SENSITIVE INFORMATION
*ENTRY NPL/STATUS INDICATOR: N		*PROPOSED NPL UPDATE NO: 00	*FINAL NPL UPDATE NO: 00
(S) PRE-PROPOSAL TO NPL (P) SITE CURRENTLY PROPOSED F (R) SITE REMOVED FROM THE PRO (F) SITE CURRENTLY ON THE NPL	FOR THE NPL (N) S OPOSED NPL (O) N .	ITE DELETED FROM NPL ITE IS NOT CURRENTLY NOR WAS FORM ION SITE: A SITE/INCIDENT WHICH WI N STATISTICAL REPORTS	ERLY ON THE PROPOSED OR FINAL NPL LL NOT COUNT IN THE INVENTORY OR
*SITE CATEGORY: _			
(A) ABANDONED (D) DIOXIN (H) HOUSING AREA/FARM (L) LANDFILL (O) OTHER (T) MINES/TAILING	(B) CH (F) FE (I) IN (M) MA (P) PU (V) WA	EM. PLANT/IND REF DERAL FACILITY D. WASTE TREATMENT NUFACTURING PLANT RE LAGOONS TERWAYS/CREEKS/RIVERS	(C) CITY CONTAMINATION (G) GROUND WATER (J) INORGANIC WASTE (N) MILITARY RELATED (R) RADIOACTIVE SITE (W) WELLS
*OWNERSHIP INDICATOR: UN			
(PR) PRIVATELY OWNED (FF) FED. OWNED (ST) STATE OWNED	(CO) C (DI) D (MN) M	OUNTY OWNED ISTRICT OWNED UNICIPALITY OWNED	(IL) INDIAN LANDS (MX) MIXED OWNERSHIP (OH) OTHER (UN) UNKNOWN
*INCIDENT TYPE: (FOR REMOVAL OSC'S ON	LY) _		
(O) OIL SPILL OCCURING AT A L (N) SPILL (OTHER THAN OIL) OR	OCATION NOT PREVIOUSLY OTHER REMOVAL AT A LOCA	IDENTIFIED AS A CERCLIS SITE ATION NOT PREVIOUSLY IDENTIFIED AS	S A CERCLIS SITE
MEDIA SECTION			
MEDIUM: (LA) LAND (AI) AIR	(SW) SURFACE WATER	(GW) GROUND WATER	
GOAL ATTAINED: (F) FULLY ACHIEVED (A) MEDIUM NOT AFFECTED	(P) PARTIALLY ACHIEVED (Z) MEDIUM NOT INVOLVED	(U) CLEANUP UNDERWAY	
DIRECT THREAT ADDRESSED: _ (Y) YES	(N) NO	(Z) DIRECT CONTACT THE	REAT DOES NOT EXIST
*CORE DATA ELEMENT OR CODE @ USACE OWNED SUBEVENT	ANY QUESTIONS?	CALL CSC CERCLIS STAFF	ACTION:(CSC ONLY)

** PROD VERSION ** U.S. EPA SUPERFUND PROGRAM ** C E R C L I S ** SITE03: SITE INFORMATION FORM(SIF)

PAGE NO: CERHELP DATA BASE DATE: N/A CERHELP DATA BASE TIME: N/A 48 FOR INTERNAL USE ONLY

ALIAS FORM (ALI) *SITE NAME: MISSION LAND CO. *EPA ID NO: CAD981654106 FMS SITE/SPILL ID:	S/I RPM-OSC NAME/PHONE: OTHER REG CONTACT NAME/PHONE:	ENFORCEMENT SENSITIVE INFORMATION
ALIAS NAME: COMSTOCK, CROSSER AND HICKEY	ALIAS ID: 01	
STREET:	LATITUDE://	
CITY:	LONGITUDE:/	
STATE: ZIP:		
ALIAS DESCRIPTION:		
ALIAS NAME: MISSION CCH1-LIMITED	ALIAS ID: 02	
STREET:	LATITUDE://	
CITY:	LONGITUDE:/_/	
STATE: ZIP:		
ALIAS DESCRIPTION:		

*CORE DATA ELEMENT OR CODE **@ USACE OWNED SUBEVENT**

ANY QUESTIONS? CALL CSC CERCLIS STAFF

ACTION:____(CSC ONLY)

** PROD VERSION **
U.S. EPA SUPERFUND PROGRAM
** C E R C L I S **
SITEO3: SITE INFORMATION FORM(SIF)

PAGE NO: 49
CERHELP DATA BASE DATE: N/A
CERHELP DATA BASE TIME: N/A
FOR INTERNAL USE ONLY

*SITE NAME	DENT COMMENT E: MISSION L D: CAD981654	AND CO.	ITE/SPILL	ID:	OTHER		NAME/PHONE: NAME/PHONE:	ENFORCEMENT	SENSITIVE /(/(INFORMATION
CSC USE	COMMENT TYPE	GROUP NUMBER	LINE Number	*COMMENT						
•••••	_	_	_							
	_		_			 				
	_		_			 				

*CORE DATA ELEMENT OR CODE @ USACE OWNED SUBEVENT ANY QUESTIONS? CALL CSC CERCLIS STAFF

ACTION: ____(CSC ONLY)

** PROD VERSION ** U.S. EPA SUPERFUND PROGRAM ** C E R C L I S **

CERHELP DATA BASE DATE: N/A CERHELP DATA BASE TIME: N/A FOR INTERNAL USE ONLY

PAGE NO: 50

SITE03: SITE INFORMATION FORM(SIF)

*SIT	ONAL UTILITIES E NAME: MISSIO ID NO: CAD981	ON LAND C	LL ID:		OTHER	S/I REG	RPM-OSC CONTACT	NAME/PHONE: NAME/PHONE:			VE INFORMATIO	N
CSC USE	REGIONAL UTILITY CODE	Ĺ		DESCRIPTION				DATE 1 MM/DD/YY	DATE 2 MM/DD/YY	DATE 3 MM/DD/YY	FREE FIELD	

								<u> </u>				

*CORE DATA ELEMENT OR CODE a USACE OWNED SUBEVENT

ANY QUESTIONS? CALL CSC CERCLIS STAFF

ACTION: (CSC ONLY)

*CORE DATA ELEMENT OR CODE

a USACE OWNED SUBEVENT

** PROD VERSION ** U.S. EPA SUPERFUND PROGRAM ** C E R C L I S ** SITEO3: SITE INFORMATION FORM(SIF)

PAGE NO: 5
CERHELP DATA BASE DATE: N/A
CERHELP DATA BASE TIME: N/A
FOR INTERNAL USE ONLY

ACTION: ____(CSC ONLY)

OPERABLE UNITS (OPU) *SITE NAME: MISSION LAND CO. *EPA ID NO: CAD981654106 FMS	S/I RPM-OSC NAME/PHONE:
*OPERABLE UNIT IND: 00	*OPERABLE UNIT NAME: SITE EVALUATION/DISPOSITION
*OPERABLE UNIT DESCRIPTION: _	
_	
_	
_	
*OPERABLE UNIT IND:	*OPERABLE UNIT NAME:
*OPERABLE UNIT DESCRIPTION: _	
_	
_	
_	
	*OPERABLE UNIT NAME:
*OPERABLE UNIT DESCRIPTION:	
	
NOTE #500.000	
*FUR REM	EMEDIAL AND REMOVAL EVENTS, OPERABLE UNIT INDICATOR = 00. DIAL EVENTS, ASSIGN OPERABLE UNIT INDIICATORS BEGINNING WITH 01. S LINK" LINKS AN OPERABLE UNIT WITH A SPECIFIC ALIAS
AN ALI	S LINKS AN OFERABLE UNIT WITH A SPECIFIC ACIAS

ANY QUESTIONS? CALL CSC CERCLIS STAFF

** PROD VERSION ** U.S. EPA SUPERFUND PROGRAM _** C E R C L I S **

SITE03: SITE INFORMATION FORM(SIF)

PAGE NO: 5
CERHELP DATA BASE DATE: N/A
CERHELP DATA BASE TIME: N/A
FOR INTERNAL USE ONLY

PREREMEDIAL INFORMATION (EVT/SVT/FIN) *SITE NAME: MISSION LAND CO. *EPA ID NO: CAD981654106 FMS S	EVENT REGION	S/I RPM-OSC IAL CONTACT REG CONTACT	NAME/PHON	NE:	ENFORCEMENT SENSITIVE INFORMATION				
*OP UNIT *OP UNIT NAME *EVENT NAME *SUBEVENT NAME *SUBEVENT NAME 00 SITE EVALUATION/DI	LEAD		START *PLAN (FY/Q)	*ACTUAL (MM/DD/YY)	< PLAN (MM/DD/YY)	*PLAN	TE> *ACTUAL (MM/DD/YY)	PLANNING STATUS	SCAP NOTE
DS1 DISCVRY 01 *EVENT QUALIFIER: _	F	_/_/_	_/_	_/_/_	_/_/_	_/_	12/26/90		
PA1 PA 01 *EVENT QUALIFIER: N	F	_/_/_	_/_	_/_/_	_/_/_	_/_	12/20/91		

• •



URS CONSULTANTS, INC.

401 EAST OCEAN BOULEVARD MEZZANINE LEVEL LONG BEACH, CALIFORNIA 90805

TEL: (213) 436-9386 FAX: (213) 436-2029 OFFICES

.=5 /EGAS

SAN FRANCISCO SEATTLE CENVER SANTA BARBARA COLORADO SPRINGS SACRAMENTO PORTLAND AMBHORAGE CAN BERNARDINO CAN BERNARDINO CAN BERNARDINO CAN BERNARDINO NEW YORK CLEVELAND COLUMBUS PARAMUS AKRON BUFFALO NEW ORLEANS ATLANTA BOSTON VIRGINIA BEACH SAN ANTONIO PITTSBURGH

September 17, 1991

Mr. Brad Skepner
Property Manager
Mission-CCH1 Limited
321 12th Street
Manhattan Beach, California 90266

Dear Mr. Skepner:

URS Consultants, Inc., is currently a contractor to the United States Environmental Protection Agency (EPA) under Contract Number 68-W9-0054. Pursuant to Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA or Superfund), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and Section 3007 of the Resource Conservation and Recovery Act of 1986 (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), the EPA is conducting a nationwide inventory and screening of sites and facilities where hazardous substances may be located. Under the contractual relationship with the EPA, URS Consultants (URS) is responsible for assisting the EPA in identifying and investigating such potential sites. Enclosed is a letter of introduction duly designating URS to perform such work on behalf of the EPA.

Mission Land Company has been listed on the EPA's inventory of potential hazardous substance sites. The EPA has requested that URS conduct a Preliminary Assessment (PA) of Mission Land Company, located at the 1500 block of Rosecrans Avenue, Manhattan Beach, California. As part of the PA, an on-site inspection will be conducted to obtain information about current and historical practices at the facility. The on-site inspection will include a meeting with your company's representatives, followed by a walk-through tour of the facility.

Pursuant to applicable provisions of Section 104 of CERCLA; Section 3007 of the Resource Conservation and Recovery Act; Section 9 of the Federal Insecticide, Fungicide, and Rodenticide Act; Section 3 of the Toxic Substances Control Act; and Section 308 of the Clean Water Act, the EPA hereby request that you make the following documents available to URS at the time of the facility tour:

- Ownership and operational history of the site.
- Site plans, facility maps, and historical aerial photographs, if available, showing the locations of any hazardous substances, pollutant or contaminant, management activities, wells, buildings, drainage, and any other relevant features.



- List of all hazardous substances, pollutants or contaminants generated, stored, treated, disposed of at or transported from the facility; include dates and amounts, if known.
- Description of past and present waste management practices including on-site generation, storage, treatment, disposal, or removal of hazardous substances, pollutants, or contaminants.
- Description of all on-site hazardous substance, pollutant or contaminant storages, treatment or disposal areas, including size, containment features, dates used, and amounts of materials stored, treated or disposed of.
- Description of any releases of hazardous substances to the environment. Include dates and regulatory agency response to the releases, if any.
- Description of any environmental or public health regulatory or enforcement agency involvement at your facility.
- Description of all federal, state, and local permits held by the facility. Include permit number, issuance and expiration dates. Also describe any occurrence of noncompliance with these permits.

Please also see Attachment A to the accompanying letter for important information on confidential business information. If you wish to comment on the confidentiality of the information requested or EPA's release of such confidential information to URS, you must do so in writing within five (5) days from your receipt of this letter. Submit any such comments to:

Thomas A. Mix

Chief, Site Evaluation Section (H-8-1)
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94015

The meeting and facility tour of Mission Land Company is scheduled for Tuesday, September 24, 1991, at 10:00 a.m.



Two URS representatives will be present during the facility meeting and tour. Our corporate health and safety requirements may necessitate our carrying certain air monitoring equipment with us during the facility tour. This equipment will be used to monitor our own exposure to hazardous materials and will not be used to document air quality at the facility. We will also be taking pictures during the facility tour.

If you have any questions about the meeting and facility tour, or about the PA in general, you can contact me at our office in Long Beach at (213) 436-9386, or you may contact Rachel Loftin, EPA Work Assignment Manager at (415) 744-2348.

Sincerely,

URS CONSULTANTS, INC.

Mitchell K. Middagh Project Manger

Attachment

EPA/PASI/SVC/CAD981654106



Attachment A

Access to the information requested by the EPA in the accompanying letter must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested pursuant to CERCLA Section 104(e); and 40 CFR, Section 2.203 (b), by attaching to such information at the time EPA's duly designated representative is provided access to such information, a cover sheet, stamped or typed legend, or some other suitable form of notice, employing language such as TRADE PROPRIETARY, or CONFIDENTIAL **BUSINESS** INFORMATION. Information covered by such a claim will be released by EPA or its representatives only to the extent authorized by CERCLA Section 104 (e). If no such claim accompanies the information when it is released to EPA's duly designated representative, it may be made available to the public by EPA and its representatives without further notice to you. You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

The regulations of 40 CFR, Section 2.211, preclude EPA employees from wrongfully using or disclosing any business information that was obtained during the performance of the employees' official duties. In addition, EPA employees must take all appropriate action to safeguard business information from improper disclosure. EPA employees who violate these requirements are subject to dismissal, suspension, or fines. Criminal action may be taken against EPA employees who willfully disclose confidential business information. A contractor with EPA who obtains business information during execution of an EPA contract can disclose information only as allowed in the contract. EPA regulations on confidentiality in 40 CFR, Part 2, Subpart B, require that the contractor agree to the clause entitled, *Treatment of Confidential Business Information* before any confidential business information may be furnished to the contractor.

This letter serves as notice to you, pursuant to 40 CFR, Section 2.310(h), of the contemplated disclosure by EPA of the information at your facility relating to:

- Any materials which have been or are generated, treated, stored, disposed of, or transported from, the facility; and
- Your ability to pay for or to perform a cleanup.

The EPA plans to disclose this information to URS Consultants, Inc., under Contract Number 68-W9-0054. This disclosure is necessary in order for URS to carry out the inspection of your facility, including document review and copying. Pursuant to 40 CFR Section 2.310(h), you may submit comments to EPA on EPA's disclosure of confidential business information to its authorized representatives. Any comments on this contemplated



disclosure must be submitted to EPA within five (5) days of your receipt of this letter. Submit any such comments to:

Thomas A. Mix
Chief, Site Evaluation Section (H-8-1)
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94015

Failure to submit your comments in a timely manner shall not be cause for refusal to allow URS Consultants, Inc., access to the requested records.

LAW OFFICES

MITCHELL, SILBERBERG & KNUPP
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

TRIDENT CENTER

11377 WEST OLYMPIC BOULEVARD

LOS ANGELES, CALIFORNIA 90064-1683

(213) 312-2000

WRITER'S DIRECT NUMBERS

TELEPHONE (213) 312-3176

OMNIFAX (213) 312-3788

December 10, 1990

CABLE ADDRESS SILMITCH

TELEX 69-1347
OMNIFAX (213) 312-3100

13/04-2-5

DOCUMENT NUMBER DXR L004.CCH

H-1

William K. Reilly Administrator United States Environmental Protection Agency 401 M Street Washington, D.C. 20460

Re: Claim by Mission Land Co. Against Chevron Corp.

Dear Mr. Reilly:

LONDON OFFICE

SECOND FLOOR

16 BELL YARD LONDON WC2A 2JR TELEPHONE OI 831 5434 FAX: OI 831 8605

This firm represents Mission Land Company/Comstock, Crosser & Hickey ("CCH") in connection with a dispute involving a certain property owned by CCH located at 1500 Rosecrans Avenue, Manhattan Beach, California ("the Property"). This letter is sent pursuant to the notice provisions found in 42 USC §9659(d)(1), and 42 USC §6972(b)(1).

CCH intends to file a lawsuit in federal district court against Chevron Corporation ("Chevron") seeking indemnity and contribution for costs incurred by CCH for violations of standards, regulations, and requirements under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, 42 USC §§ 9601 et. seq. ("CERCLA"), and the Resource Conservation and Recovery Act ("RCRA").

CCH purchased the Property from a third party in 1988, and continues to own the Property. On or about 1989, CCH has had to clean up the Property and take other remedial action because of contaminated soils placed on the Property by Chevron. In addition, the contaminated soil on the Property resulted in the generation of methane gas, requiring CCH to install a methane protection system on the Property. CCH undertook in its cleanup and corrective activities in conjunction with the State of California, Department of Health Services ("DHS").

William K. Reilly, Admir trator
United States Environmental Protection Agency
December 10, 1990
Page 2

Historically, part of the Property was located within the boundary of one of four former reservoirs owned by Chevron between the 1920's and the 1960's. When these reservoirs were dismantled, large quantities of soil were discovered to be soaked with oil. During subsequent cut and fill grading operations, oily soils were mixed with clean sand and spread throughout the oil storage area site, including over the western edge of CCH's property. CCH's consultants concluded that the contaminated soils on the Property included "cutter stock" and partially refined oils, and that the methane was generated by bacterial interaction with the oily soils.

In taking all necessary steps to clean up and remediate the Property, CCH expended significant sums of money, totaling \$283,585.14. CCH never caused nor engaged in any activity resulting in the contamination of the Property, and is not responsible for the clean up. Chevron is alone responsible for the above costs incurred and paid by CCH. CCH intends to file a lawsuit against Chevron for reimbursement of the cleanup costs, asserting claims under CERCLA, RCRA, as well as causes of action based on nuisance, trespass, negligence, ultra hazardous activities, equitable indemnity, unfair competition, fraud and the Racketeer Influence and Corrupt Organizations Act ("RICO").

CCH will file its action herein sixty (60) days from the date of this Notice, unless the EPA or the DHS elect to commence and are diligently prosecuting such action under CERCLA or RCRA against Chevron.

Sincerely,

Daniel Romano

for

Mitchell, Silberberg & Knupp

DR:lrc

cc: Daniel McGovern, Regional Administrator, EPA, Region IX 1235 Mission Street, S.F., CA 94103

> Department of Health Services, Toxic Substances Control Div., 107 S. Broadway, Room 7128, Los Angeles, CA 90012

J.W. Ross, Managing Environmental Counsel, Law Department, Chevron Corp, P.O. Box 7141, San Francisco, CA 94120-7141